

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 EASTERN DIVISION
4
5 ROOSEVELT PARKER,
6 Plaintiff,
7
8 VERSUS CIVIL ACTION NO. 2:22-cv-45-HSO-BWR
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10 STATE FARM FIRE AND
11 CASUALTY COMPANY,
12 Defendant.

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20 VIDEOCONFERENCE DEPOSITION OF SCOTT BERBERICH

21
22 Taken via Zoom Videoconference Software, on
23 Tuesday, January 10, 2023, beginning at
24 1:00 p.m.
25

1 A. Not that I know of.

2 Q. Other than these 15 to 20 cases where you
3 are serving as an expert witness through ATA, have
4 you ever, in your career, served as an expert
5 witness in a lawsuit?

6 A. No.

7 Q. Have you ever worked as a roofer before?

8 A. No.

9 Q. Other than the eight or ten mitigation
10 jobs we talked about, do you have any contracting
11 experience?

12 A. No.

13 Q. Do you have any engineering experience?

14 A. No.

15 Q. In what fields do you consider yourself
16 to be an expert?

17 A. At storm damage assessment.

18 Q. And what does that entail?

19 A. Inspecting a loss, looking at damage,
20 damage to the exteriors, the roof, the interiors,
21 looking at the water patterns of the damage,
22 determining the approximate extent of what needs
23 to be repaired, or in some cases, if it is going
24 to exceed a policy limit, then it might be a total
25 loss.

1 But, primarily, it's assessing storm
2 damage and what is typical storm-related damages
3 versus damages that are ongoing, leaks, whether
4 they be from plumbing, or pipe bursts, or leakage
5 from long-term leaks from vents, or assessing what
6 things need to be detached, reset, replaced in
7 order to make the repairs, analyzing -- analyzing
8 the patterns. And using my experience of
9 investigating thousands of claims and to
10 determine, you know, if it is storm-related or if
11 it's something that appears to be an ongoing
12 issue, as far as leakage.

13 Q. So to kind of put that in a nutshell, you
14 are holding yourself out as an expert in being
15 able to determine the cause of the damage and the
16 repairs required to fix the damage; is that
17 accurate?

18 A. Can you say that one more time?

19 Q. Yes. So you are holding yourself out to
20 be an expert to determine the cause of the damage
21 and the repairs required to fix the damage; is
22 that correct?

23 A. Yes.

24 Q. Okay. How is -- other than -- outside of
25 compensation, how is that different than what a